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1/30/2014

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 11 UNITED STATES DISTRICT COURT
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 13 NORTHERN DISTRICT
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 15 SAN JOSE DIVISION

16 THE BOARD OF TRUSTEES OF THE
 17 LELAND STANFORD JUNIOR
 18 UNIVERSITY,
 19
 20 Plaintiff,

21 vs.
 22
 23 Chiang Fang Chi-Yi, an Individual; Chiang
 24 Yo-mei, an Individual; Chiang Hsiao-
 25 chang, an Individual; Chiang Tsai-mei, an
 26 Individual; Chiang Yu-sung, an Individual;
 27 Chiang Yo-lan, an Individual; Chiang Yo-
 28 bo, an Individual; Chiang Yo-chang, an
 Individual; Chiang Yo-ching, an
 Individual; and Chungyan Chan, an
 Individual,

Defendants.

No. CV 13-04383-EJD-HRL

**STIPULATION TO EXTEND TIME
 TO RESPOND TO INITIAL
 COMPLAINT TO APRIL 14, 2014
 (L.R. 6-1)**

Complaint Filed: September 20, 2013
 Per Fed. R. Civ. Proc. 4(d)(3)
 Current Response Date: January 30, 2014
 New Response Date: April 14, 2014

1 WHEREAS Plaintiff THE BOARD OF TRUSTEES OF THE LELAND
2 STANFORD JUNIOR UNIVERSITY (“Plaintiff”) filed and served its Complaint
3 in Interpleader pursuant to Rule 4(d)(3) of the Federal Rules of Civil Procedure
4 upon Defendant Chiang Yomei a/k/a Yomei Chiang (“Defendant”) on September
5 20, 2013;

6 WHEREAS Defendant’s response to the Complaint is currently due on
7 January 30, 2014;

8 WHEREAS Defendant understands from Plaintiff’s counsel that seven of the
9 other defendants have agreed to accept service of the Complaint and respond to the
10 Complaint by April 14, 2014;

11 WHEREAS Defendant believes, and Plaintiff agrees, that requiring all
12 answers to be filed on the same date makes sense in terms of administration and
13 progress of this case;

14 WHEREAS Defendant has requested, and Plaintiff has granted, an extension
15 for Defendant to respond to the Complaint, through and including April 14, 2014;

16 WHEREAS this is the second extension of time to respond to the Complaint
17 that Defendant has requested; and

18 WHEREAS nothing contained in this stipulation is intended to be, nor is it,
19 an admission by Defendant as to the validity of jurisdiction or venue, nor shall it
20 constitute a waiver of the right to object to personal jurisdiction or to venue.

21 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

22 1. Defendant shall have to and including April 14, 2014 in which to
23 respond to the Complaint;

24 2. Nothing contained in this stipulation is intended to be, nor is it, an
25 admission by Defendant as to the validity of jurisdiction or venue, nor shall it
26 constitute a waiver of the right to object to personal jurisdiction or to venue.

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3. This Stipulation is without prejudice to any party's rights, remedies, defenses, or positions in the case.

Dated: January 29, 2014

MANATT, PHELPS & PHILLIPS LLP

By /s/
Shari Mulrooney Wollman
Attorneys for Defendant
Chiang Yo-mei (a/k/a Yo-Mei Chiang)

Dated: January 29, 2014

PILLSBURY WINTHROP SHAW
PITTMAN LLP

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